

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. <u>3:25-mj-1204</u>
	)	
	)	JUDGE NEWBERN
GERARDO CARDONA-GONZALEZ	)	

**UNITED STATES' MOTION FOR DETENTION HEARING**  
**AND FOR DETENTION OF THE DEFENDANT**

COMES NOW the United States of America by Robert E. McGuire, Acting United States Attorney, and Joshua A. Kurtzman, Assistant United States Attorney, and moves this Court for a detention hearing and for detention of the Defendant in this matter. Federal law holds that “the judicial officer shall hold a hearing to determine whether any conditions or combination of conditions...will reasonably assure...the safety of any other person and the community – upon motion of the attorney for the Government or upon the judicial officer’s own motion in a case, that involves...any felony...that involves a narcotics offense for which the maximum term of imprisonment is ten years or more.” 18 U.S.C. § 3142(f)(1)(A)-(E). The statement in support of the Criminal Complaint in this case describes that the Defendant possessed significant amounts of cocaine and methamphetamine that he intended to distribute, which is a felony narcotics offense for which the maximum term of imprisonment is ten years or more. Therefore, the Court should set a detention hearing based on the fact that, statutorily, the Government is entitled to one on their own motion in a case involving this offense.

The United States respectfully requests a continuance of three business days in order to adequately prepare for the hearing in this matter.

Respectfully submitted,

ROBERT E. MCGUIRE  
Acting United States Attorney

By:

/s/ Joshua A. Kurtzman  
AUSA JOSH KURTZMAN  
Assistant U.S. Attorney  
719 Church Street, Suite 3300  
Nashville, Tennessee 37203